

EXHIBIT 4

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

PEOPLETLO MANUFACTURING, §
INC., §

Plaintiff, §

VS. §

Case No. 20-cv-03642

SUNDYNE, LLC, ACCUDYNE §
INDUSTRIES LLC, DXP §
ENTERPRISES, INC., and §
PUMPWORKS, LLC, §

Defendants. §

PUMPWORKS, LLC, §

Counter-Plaintiff, §

VS. §

PEOPLETLO MANUFACTURING, §
INC., §

Counter-Defendant. §

ORAL DEPOSITION OF GEORGE CONRAD GIESSING

Houston, Texas

January 12, 2023

9:08 a.m.

Reported by:

Micheal A. Johnson, RDR, CRR

Job No. 18311

1 I only make five Group 1 MCUs a week. I make five
2 MCUs a week. That was what PeopleFlo told us.

3 Q. Okay.

4 A. So I'm just trying to confirm or what --
5 I didn't write the purchase order, but the purchase
6 order was trying to confirm what their lead time
7 would be. And we got no response from anybody at
8 PeopleFlo questioning those placeholders or getting
9 back to us to tell us what those deliveries would
10 be.

11 Q. Well, we'll show you some documents in a
12 second that you may have missed.

13 A. Okay.

14 Q. But my question for you again is the
15 purchase orders did not specify delivery date,
16 correct?

17 MS. THOMPSON: Asked and answered.

18 A. Asked and answered, yeah. I don't have
19 any other comments to make.

20 BY MR. RUSKUSKY:

21 Q. Okay. The contract, the development
22 supply agreement, did not specify a delivery date
23 for the MCUs, is that correct, on behalf of
24 PumpWorks?


25 A. No, it did not.

1 REPORTER'S CERTIFICATION

2
3 I, Micheal A. Johnson, Registered Diplomate
4 Reporter and Notary Public in and for the State of
5 Texas, certify that on the 12th day of
6 January, 2023, I reported the Oral Deposition of
7 GEORGE CONRAD GIESSING, after the witness had first
8 been duly cautioned and sworn to testify under oath;
9 said deposition was subsequently transcribed by me
10 and under my supervision and contains a full, true
11 and complete transcription of the proceedings had at
12 said time and place; and that reading and signing
13 was requested.

14 I further certify that I am neither counsel
15 for nor related to any party in this cause and am
16 not financially interested in its outcome.

17 GIVEN UNDER MY HAND AND SEAL of office on
18 this 12th day of January, 2023.

19 
20
21

22 MICHEAL A. JOHNSON, RDR, CRR
23 NCRA Registered Diplomate Reporter
24 NCRA Certified Realtime Reporter
25 Notary Public in and for the
State of Texas
My Commission Expires: 8/8/2024
Thompson Court Reporters, Inc.